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July 13, 2011

**VIA ELECTRONIC FILING
FACSIMILE TRANSMISSION
& FIRST CLASS MAIL**

Magistrate Judge Cheryl L. Pollak
United States District Court
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Quarley v. Schiavone Construction, et al.
Docket No.: 11 CV 2037
Our File No.: 1533-95932

Dear Judge Pollak:

This firm represents Defendants WDF Development, LLC and WDF, Inc. in the above-referred matter. This is a request for an extension of time to respond to the Plaintiff's Summons and Complaint. This is our second request.

We have secured the consent of the Plaintiff's attorney and we respectfully request that our time to respond to the Plaintiff's Summons and Complaint be extended to July 29, 2011. We are currently gathering information in support of defendants' position that they were not properly named as defendants. It is anticipated that no further extensions will be required.

Enclosed please find a stipulation extending our time to respond and we respectfully request Your Honor to "so order" this stipulation.

Thank you for your assistance in this regard.

Very truly yours,

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

A handwritten signature in black ink, appearing to read "AKleinman", is written over the typed name "Andrea S. Kleinman".

Andrea S. Kleinman

ASK/kl
Enclosure

cc: Michael G. O'Neill, Esq.
Attorneys for Plaintiff
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New York, New York 10007

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
BEN QUARTEY,

Plaintiff,

-against-

SCHIAVONE CONSTRUCTION CO., LLC, SCHIAVONE
CONTRACTING CORP., JOHN P. PICONE, INC.,
WDF DEVELOPMENT, LLC and WDF, INC.,


Defendants,
-----X


Docket No. 11-CV-2037

**STIPULATION
EXTENDING
TIME TO ANSWER**

IT IS HEREBY STIPULATED that the time for the defendants WDF DEVELOPMENT, LLC and WDF, INC., to appear and to answer, amend or supplement the answer as of course, or to make any motion with relation to the Summons or to the Complaint in this action, be and the same is hereby extended to and including the 29th day of July, 2011. An executed copy of this stipulation shall be deemed the same as a signed original.

Dated: Garden City, New York
July 12, 2011


Michael G. O'Neill, Esq. By: Theresa B. Wash, Esq.
Attorneys for Plaintiff
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WDF, INC.
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SO ORDERED:

CHERYL L. POLLAK, MJ

Date: _____